

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

DIVISION

FILED

DEC 18 2018

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
By _____ DEP CLK

Robert Elias Marge

(Enter above the full name
of the Plaintiff[s] in this
action).

Case No. 5:18-CV-00592-FL

(To be assigned
by the Clerk of
District Court)

vs.

N.C. Detective Agency
Att. Roger Ladd (President)
(Owner)

Kevin Ladd (V.P.)

(Enter above the full name of
ALL Defendant[s] in this action.
Fed.R.Civ.P.10(a) requires that
the caption of the complaint
include the names of all the
parties. Merely listing one
party and "et al." is insufficient.
Please attach additional sheets if
necessary).

COMPLAINT

1. Plaintiff resides at 2857 Haw River Trail
Apex, N.C. 27502

2. Defendant(s) name(s): North Carolina Detective Agency
Roger Ladd (President)
Kevin Ladd (V.P.)

Location of principal office(s) of the named defendant(s):
2102 Fay St. Durham, N.C. 27704

Nature of defendant(s) business: Security

Approximate number of individuals employed by defendant:
Approx. (50) (Fifty) or more.

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on this court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 20003-5(g).

4. The acts complained of in this suit concern:

- (A) ☐ Failure to employ me.
- (B) ☒ Termination of my employment.
- (C) ☐ Failure to promote me.
- (D) ☐ Other acts as specified below:

"New"

Recently on 11/6/18 the undersigned
(Robert Marge) (Plaintiff) came to a monetary
settlement with (Respondent) (Ladd) Insurance
company for the Worker's Comp. side of
this action. By settling the above
matter I have established a "prima facie"
case. IC File # 18-724377

5. Plaintiff is:

(A) ☐ presently employed by the defendant.

(B) ☒ not presently employed by the defendant.

The dates of employment were May 6, 2018 to Sep. 23, 2018

Employment was terminated because:

(1) ☒ plaintiff was discharged.

(2) ☐ plaintiff was laid off.

(3) ☐ plaintiff left job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the
following:

(A) ☐ my race.

(B) ☐ my religion.

(C) ☐ my sex.

(D) _____ my national origin.

(E) ☒ other as specified below:

Americans with Disabilities Act.
Terminated by Kevin Ladd on 9/22/18

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are):

Kevin Ladd (V.P.) Male, White, 38 yrs. old
Roger Ladd (President) Male, White 62 yrs. old

8. The alleged discrimination occurred on or about 9/22/18
on or about 11:30 AM.

9. The nature of my complaint, i.e., the manner in which the individuals(s) named above discriminated against me in terms of the conditions of my employment is as follows:

The Plaintiff has an active Worker Comp.
Case I.C. File # 18-724377; EEOC # 433-2018-02574
Plaintiff was terminated by defendant Kevin
Ladd/Roger Ladd at above time and date because

I "called out" sick on my Workers Comp. Injury. Kevin hadd (who actually terminated me). "You're fired; I don't care if you have a Workers Comp Case;" "You're still fired".
(See enclosed documents)

10. The alleged illegal activity took place at: My residence
(Former) 233 Churchview St. Cary, NC. 27513

11. I filed charges with the Equal Employment Opportunity

Commission regarding defendant(s) alleged discriminatory conduct

on or about June 4, 2018. I have attached a copy of

the Notice of Right to Sue letter issued by the Equal Employment

Opportunity Commission. This letter was received by me on _____

12. I seek the following relief:

(A) _____ recovery of back pay;

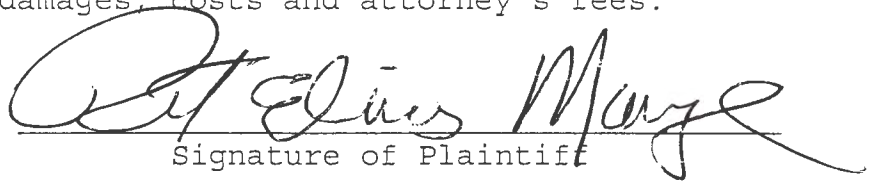
(B) _____ reinstatement to my former job;

(C) ☒ trial by jury on all issues so triable;

and any other relief as may be appropriate, including

injunctive orders, damages, costs and attorney's fees.

12/14/18
Date


Signature of Plaintiff

2857 Haw River Trail
Apex, N.C. 27502
(631) 804-4717
Address and Phone Number of Plaintiff